

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

McMANIMON SCOTLAND & BAUMANN

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Counsel to Thomas J. Orr, Trustee

In Re:

BROWN, Carolyn E.,

Case No.: 20-20921(CMG)

Chapter: 7

Hearing Date: 2/2/2021, 10am

Judge: Gravelle

ADJOURNMENT REQUEST

1. I, Andrea Dobin,

☒ am the attorney for: Thomas J. Orr, Trustee,

☐ am self represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: Moiton to Dismiss/Motion for Relief - ECF 35

Current hearing date and time: 2/2/2021, 10am

New date requested: 3/23/2021, 10am

Reason for adjournment request: The Trustee has engaged in discussions with Movant to address (in a global manner) Movant's concerns.

2. to withdraw the Motion to Convert. Otherwise the Safe Harbor will be undermined.
Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: January 27, 2021

/s/ Andrea Dobin
Signature

COURT USE ONLY:

The request for adjournment is:

- ☒ Granted New hearing date: March 23, 2021 at 10:00 a.m. ☐ Peremptory
- ☐ Granted over objection(s) New hearing date: _____ ☐ Peremptory
- ☐ Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.